

44795

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RE: Delone Leslie	:	
	:	
Debtor	:	Bky No. 18-16697 AMC
Federal National Mortgage Association	:	
("Fannie Mae")	:	Chapter 13
	:	
Movant	:	
	:	
Delone Leslie	:	
William C. Miller	:	
	:	
Respondents	:	

ORDER

AND NOW THIS 28th DAY OF May, 2019, it is hereby **ORDERED**, that the attached stipulation is **APPROVED**.



UNITED STATES BANKRUPTCY JUDGE

Dated:

Copies to:

Martha E. Von Rosenstiel, P.C.
649 South Avenue
Secane, PA 19018

William C. Miller
P.O. Box 1229
Philadelphia, PA 19105

Michael Seth Schwartz, Esquire
707 Lakeside Office Park,
Southampton, PA 18966

Delone Leslie
1612 Clifton Avenue,
Sharon Hill PA 19079

44795/18-16697

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RE: Delone Leslie	:	
Debtor	:	Bky No. 18-16697 AMC
Federal National Mortgage Association	:	
("Fannie Mae")	:	Chapter 13
Movant	:	
Delone Leslie	:	
William C. Miller	:	
Respondents	:	

STIPULATION IN SETTLEMENT OF MOTION FOR RELIEF

It is hereby stipulated by and between Heather S. Riloff, Esquire the Law Offices of Martha E. Von Rosenstiel, P.C., attorney for the movant Mr. Cooper, and Michael Seth Schwartz, Esquire, Esquire attorney for Delone Leslie that the Automatic Stay pursuant to Section 362(e) of the Bankruptcy Code remain in effect, provided that the conditions set forth below are met.

As of the date of this Stipulation, Debtor is in arrears on post-petition payments in a total amount of \$5,175.41, which breaks down as follows:

DUE DATE	AMOUNT
1/1/2019 through 5/1/2019 @ 907.61 each	\$4,538.05
Less Suspense	(\$ 393.64)
Motion for Relief Fee	850.00
Motion for Relief Filing Costs	181.00
Total Post Petition Arrears	\$5,175.41

44795 /18-16697

Debtor hereby agrees to pay the arrears now due, as follows:

(1) **On or before May 20, 2019**, Debtor shall remit Payment to Movant in the amount of \$907.61, which will represent the May 1, 2019 post-petition payment. Payment shall be made by **CERTIFIED CHECK, CASHIERS CHECK OR MONEY ORDER.**

(2)) Beginning with the payment due June 1, 2019, and continuing for 6 months through November 1, 2019, Debtor shall remit payment to Movant in the amount of \$1,618.91. Each said installment includes payment for the regular monthly mortgage installment (which is subject to change) of \$907.61 and \$711.30 toward reduction of the arrears specified above.

(3) All Payments shall be made by **CERTIFIED CHECK, CASHIERS CHECK OR MONEY ORDER**, and made payable to:

Mr. Cooper
Post Office Box 619094
Dallas, TX 75261-9741

(4) Debtor further agrees that upon completion of the payment schedule in paragraph 2 Debtor will continue to make the regular Monthly mortgage payment (which is subject to change) of \$907.61 beginning December 1, 2019, and will continue to make the monthly trustee payments in a timely manner continuing through the life of the plan.

IN THE EVENT OF DEFAULT

If any of the above payments is not made on or before the due date for one month, The Law Offices of Martha E. Von Rosenstiel, PC attorney for the movant will send the Debtor and the Debtor's attorney a **TEN (10) DAY NOTICE OF DEFAULT**. If the default **IS NOT** cured within **TEN (10) DAYS FROM THE DATE OF THE NOTICE**, The Law Offices of Martha E. Von Rosenstiel P.C., attorney for the movant, Mr. Cooper will file a Certification of Default

44795 /18-16697

with the court and upon receipt of the Order granting the relief requested may proceed with the foreclosure action, giving Debtor full credit for all mortgage payments received.

IN THE EVENT OF CONVERSION

In the event that the Debtor should convert to a Chapter 7, the Debtor agrees that Martha E. Von Rosenstiel, P.C. will send the Debtor and the Debtor's attorney a **TEN (10) DAY**

NOTICE. If after ten (10) days the Debtor has failed to contractually reinstate the account, including all late charges, and fees and costs, a Certification of Default will be filed with the court requesting that the Automatic Stay be lifted with regard to the premises located at **1612 CLIFTON AVENUE, SHARON HILL PA 19079.**

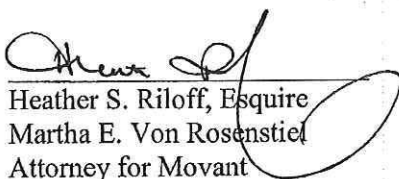
The Debtor(s) agree(s) that any Order granting Relief from the Automatic Stay will include a waiver of the F.R.B.P Rule 4001(a)(3) and that Movant, its successors and /or assigns may act upon the Order immediately.

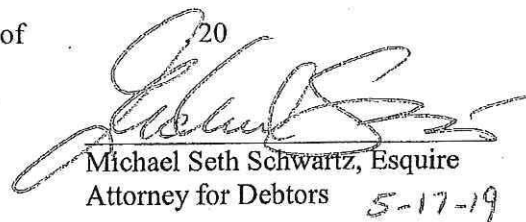
It is agreed that Facsimile and /or electronic signatures are accepted as originals. Parties request that the attached Order be approved the Court.

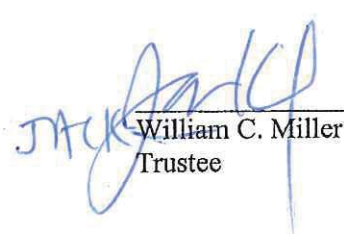
Signed and agreed to this

day of

20


Heather S. Riloff, Esquire
Martha E. Von Rosenstiel
Attorney for Movant


Michael Seth Schwartz, Esquire
Attorney for Debtors 5-17-19


William C. Miller
Trustee

No objection